

FACILITY RESPONSE PLAN REVIEW FORM (8/23/93)

(Proposed Amendment 58 FR 8846)

Facility and Location: Williams Pipe Line Terminal, Wathena, Ks.

Review Approved: [Signature] (Date) 02/16/94

ID Number: FRP07A0023

Explanation: A "Yes" entry on the checklist indicates that the topic appears to be adequately addressed in the plan. A "No" entry indicates that the topic is either not addressed or not adequately addressed. A "N/A" entry indicates that the item is not applicable for the plan being reviewed.

=====CHECKLIST=====

1.1 Emergency Response Action Plan

No

Comment: Plan contains the discrete Emergency Action Plan Section called for in the regulation. However, the content differs substantially from that specified in the proposed regulation. This Section should contain the following information:

Identity and phone number(s) [24 hour] of individual having authority to implement removal actions.

Identity of individuals or organizations to be contacted in the event of a discharge (call-down list).

Spill response notification form.

Description of facility's own response equipment and its location.

Description of duties of facility response personnel during a response action, their response times and qualifications.

Plans for evacuation of the facility (and surrounding community, if appropriate).

Description of immediate measures to provide adequate containment and drainage of spilled oil.

Diagram of the facility.

1.2 Facility Information

Yes Location of facility.

No Identity and tenure of the present owner and operator.

Comment: Plan identifies owner but does not indicate in what year oil storage began at the facility nor document any changes that have occurred in oil storage since that time.

Yes Identity of emergency response coordinator.

1.3 Emergency Response Information

Yes Identity of private personnel and equipment necessary to deal with a worst case discharge or threat thereof.

Yes Evidence of contracts or other approved means for ensuring the availability of such personnel/equipment.

Yes Identity of individuals or organizations to be contacted in the event of a discharge (call-down list).

No Spill response notification form.

Comment: Emergency/Maintenance/Leak Report Form in plan does not contain all the information that should be included in a spill report form (see Appendix G of proposed regulation).

Yes Description of duties of facility response personnel during a response action, their response times and qualifications.

Yes Description of facility's own response equipment, its location and testing.

No Plans for evacuation of the facility (and surrounding community, if appropriate).

Comment: The regulation requires that this information (including the diagram listed immediately below) be included in the plan.

No Diagram of evacuation routes.

No Description of the duties of the emergency response coordinator:

Comment: Plan describes a flexible response organization and contains a very detailed

description of the possible duties of the response team under ICS. However, the EPA proposed regulation requires that the plan clearly state that the qualified individual (Emergency Response Coordinator) is accountable for the performance of each of the following duties:

Activate internal alarms and hazard communication systems to notify all facility personnel.

Notify all response personnel, as needed.

Identify the character, exact source, amount, and extent of the release, as well as the other items needed for notification.

Notify and provide necessary information to the appropriate authorities with designated response roles.

Assess the interaction of the spilled substance with water and/or other substances stored at the facility and notify response personnel at the scene of that assessment.

Assess the possible hazards of the release (direct and indirect) to human health and the environment.

Assess and implement prompt removal actions to contain and remove the substance released.

Coordinate rescue and response actions as previously arranged with all response personnel.

Obtain authority to immediately access company funding to initiate cleanup activities.

Direct cleanup activities until properly relieved of this responsibility.

1.4 Hazard Evaluation

Yes Facility history of reportable discharges.

Identify areas within facility where discharges could occur and potential effects.

Yes Tank lists including capacity, materials stored, and average inventories.

Yes Loading/unloading operations including typical throughputs.

Yes Transfer and process operations including typical throughputs.

Yes Secondary containment volumes associated with each tank, loading/unloading, or other operation.

Identify potential effects on human health, property, or the environment of a spill (vulnerability analysis):

No Calculation of planning distance.

Comment: The calculated planning distance is central to response planning and must be included in the plan.

No Discussion of the potential effects of a spill on any vulnerable receptors within the calculated planning distance such as water intakes, schools, medical facilities, residential areas, businesses, environmentally sensitive areas, transportation routes and other areas of economic importance.

Comment: Plan contains a list of environmentally sensitive areas but no discussion of why they are sensitive or whether they constitute all of the vulnerable receptors and no discussion of the potential effects on them of a spill.

1.5 Planning Scenarios

No Calculation and scenario(s) for worst case discharge.

Comment: Worst case discharge is much too small because mitigation credits (95%) have been taken. Mitigation credits are not permitted under the proposed regulation. Plan contains a detailed scenario but small discharge volume and lack of a planning distance negate its value.

No Determination and scenario(s) for small discharge (2100 gallons) (if less than the worst case discharge).

Comment: The discharge determination and scenario are required by the regulation and must be added to the plan.

No Determination and scenario(s) for medium discharge (the lesser of 36,000 gallons or 10% of the largest tank) (provided this is less than the worst case discharge).

Comment: The discharge determination and scenario are required by the regulation and must be added to the plan.

1.6 Discharge Detection Systems

No

Comment: Plan addresses pipe line leak detection at length. However, EPA's proposed regulation is concerned with the terminal facility, proper, and plan needs to address leak/release detection for the terminal as follows:

Description of the procedures and personnel that will detect spills or uncontrolled releases.

Description of any automated spill detection equipment that the facility has in place.

1.7 Plan Implementation

No Response actions to be taken to ensure facility's safety and mitigate or prevent the discharges described in the "Planning Scenarios" section, above.

Comment: Discussion in plan is generic and not specific to this facility. The response actions described also need to be based on the correct discharge volume and the calculated planning distance.

No Determination and demonstration of adequate response capability (including equipment requirement calculations consistent with Appendix F).

Comment: Plan does not contain any calculations of equipment requirements although it does contain lengthy (contractor) equipment inventories. The equipment requirement calculations need to be added to the plan and then related to the inventories to demonstrate which equipment will satisfy the requirements and why.

No Plans to dispose of contaminated cleanup materials.

Comment: Discussion included in plan is generic. It needs to be made specific to the facility's site and to the regulations of the state in which it is located.

Yes Measures to provide adequate containment of spilled oil (may, in part, be excerpted from SPCC Plan).

1.8 Self-inspection, Training, and Meeting Logs

Yes Checklist and record of inspection for tanks, secondary containment, and response equipment.

Yes Description and record of training exercises and periodic unannounced drills to be carried out under the response plan.

No Logs of discharge prevention meetings.

Comment: These logs need to be added to the plan.

1.9 Diagrams

Yes Site plan diagram

Yes Drainage plan diagram

1.10 Security Systems

Yes Description of facility security systems (may be excerpted from SPCC Plan).

2.0 Plan Cover Sheet

Yes

3.0 Additional Requirement for Plans not in EPA Format

N/A Cross-reference to EPA format. (Note: Plan must have stand-alone Emergency Response Action Plan at front of Plan or in separate binder regardless of format.)